



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

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**MEMORADUM**

**SUBJECT:** SRRD and RD Response to EFED Regarding the Current Label and Use Information for Phosmet (PC Code 059201) to Support an Endangered Species Effects Determination

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**TO:** Betsy Behl, Chief  
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In support of the Environmental Fate and Effects Division's (EFED's) endangered species assessment of the California red-legged frog (CRLF), BEAD has generated a LUIS report for phosmet. Although the major phosmet product labels reflect the mitigation described in the 2001 IRED, other product labels do not. As a result, some uses and application rates listed in the LUIS report do not accurately reflect all currently required mitigation.

Additional label changes were required for certain phosmet uses in a January 2007, decision document. New data have recently been submitted by the technical registrant (Gowan) that could also affect phosmet product labeling.

Revised product labels that will reflect mitigation from the 2001 IRED, the January 2007 decision document, and any additional label changes based on the new data, are expected to be approved by RD in the first quarter of 2008. This memo summarizes the current registrations for phosmet, as well as currently labeled uses and application rates, and how those uses and application rates are likely to change when new labels are approved in 2008.

### 1. Current registrations

There are a total of twenty-one products containing phosmet. This includes one technical product (10163-172, dated 11/7/2007). This product is used only to formulate phosmet end use products; it is listed in Table 1, but is not reviewed further. Of the twenty end-products, twelve are SLNs; however, there is only one SLN registration for use in California. The other eleven SLNs are not reviewed further.

Table 1 provides a listing of the technical product and nine end-use products that are registered for use in California. The table includes the formulation, EPA registration number, date of stamped label, % active ingredient, methods of application, and any relevant use restrictions.

Table 2 provides detailed information for each use site on the end-use and SLN labels.

### 2. Mitigation from the 2001 phosmet IRED

As stated above, the mitigation from the 2001 IRED is not reflected on all product labels. The products that do not reflect the IRED are identified in Table 1. Any IRED mitigation that is not reflected on all current product labels and that relates to use sites, application rates, or application intervals, is identified in Table 2.

### 3. Uses

All registered uses are listed in Table 2.

Citrus is only registered as a use through California and Florida SLNs (CA06000200, dated 3/29/2006, and FL010006, dated 4/26/2005).

Clover is listed as a use site in the IRED, but is only registered through an Idaho SLN (ID990024, clover grown for seed, dated 10/4/1999).

Cotton is listed as a use site in the IRED and on several current labels. Cotton has been deleted as a use site from the technical label (11/7/2007), and will be deleted from all labels in the first quarter of 2008.

Kiwi fruit is listed as a use site in the IRED and has a phosmet tolerance in the 40 CFR 180.261, but it is not listed as a use site on any section 3 or SLN label.

Sweet cherries are listed as a use site in the IRED, but are only registered through an Oregon SLN (OR940049, dated 10/19/94).

#### 4. Maximum application rates

The maximum application rates for each use site are listed in Table 2. In some cases, product labels list maximum application rates or retreatment intervals that do not reflect the mitigation required in the 2001 IRED. These cases are identified in Tables 1 and 2. New phosmet product labels that will reflect the 2001 IRED and other subsequent changes to mitigation and labeling are expected to be approved by RD in the first quarter of 2008.

**Table 1. Current phosmet product registrations (Section 3 or CA SLNs, only).**

<b>Formulation</b>	<b>Reg. no. (date of stamped label)</b>	<b>% ai</b>	<b>Methods of application</b>	<b>Use restrictions</b>	<b>Does the stamped label reflect the 2001 IRED mitigation?</b>	<b>Label changes effective in first quarter of 2008</b>
Imidan Technical	10163-172 (11/7/2007)	94%	---	For formulation of phosmet insecticide products only.	Yes	No 2008 label changes anticipated that will affect ecological risk.
Imidan 5 Dust	10163-168 (12/2/1993)	5%	Dusting equipment	Use restrictions in environmental hazards statement: Do not apply directly to water; do not contaminate water when disposing of equipment washwater or rinsate; do not apply this product or allow it to drift to blooming crops while bees are actively visiting the treatment areas.	No	Gowan has voluntarily agreed to remove the foliar use on grapes from this product.  Only the post-harvest (indoor) use on sweet potatoes will remain in 2008.
Imidan 70-W (wetable powder in water soluble bags)	10163-169 (5/31/2006)	70%	Chemigation, Groundboom, Airblast, Aerial	Use restrictions in environmental hazards statement: see 10163-168.  Restrictions on wind speed (10 mph), release height above crop canopy (2 feet for ground, 10 feet for aerial), and droplet size (coarse or coarser) to reduce offsite drift.  Other crop-specific restrictions listed in Table 2.	Yes	See Table 2 for crop specific restrictions.
	SLN CA06000200 (3/29/2006)	70%	Groundboom, Airblast, Aerial	For foliar application to citrus.  Chemigation is prohibited.	Yes	The citrus tolerance was proposed for revocation in the 2001 PIRE. However, after

<b>Formulation</b>	<b>Reg. no. (date of stamped label)</b>	<b>% ai</b>	<b>Methods of application</b>	<b>Use restrictions</b>	<b>Does the stamped label reflect the 2001 IRED mitigation?</b>	<b>Label changes effective in first quarter of 2008</b>
				Other restrictions on parent label (10163-169) apply.		the IRED was completed in 2001, EPA agreed not to revoke the citrus tolerance but instead to require new residue data to support the use. It does not appear that these data have been submitted (but there are two 24C registrations for citrus, one in FL and one in CA).
Imidan 1-E Insecticide (emulsifiable concentrate)	10163-171 (1/15/1991)	11.7% (1 lb ai/gal)	Hydraulic sprayer, Mist blower	Use restrictions in environmental hazards statement: see 10163-168.  Chemigation is prohibited.	No	Most recent stamped label is 10182-228.  2008 label will add a restriction on wind speed (10 mph).  See Table 2 for crop specific restrictions.
Fireban Fire Ant Insecticide (soluble concentrate/ liquid)	10163-174 (7/20/1988)	12.4%	Direct application (water in with garden hose), Mound drench application (sprinkler can or bucket)	Use restrictions in environmental hazards statement: see 10163-168.	No	Most recent stamped label is 476-2232.  No 2008 label changes anticipated that will affect ecological risk.
Imidan 50-WSB (wetttable powder in water soluble bags)	10163-175 (11/2/1998)	50%	Chemigation, Groundboom, Airblast, Aerial	Use restrictions in environmental hazards statement: see 10163-168.	No	2008 label will add restrictions on wind speed (10 mph), release height above crop canopy (2 feet for ground, 10

<b>Formulation</b>	<b>Reg. no. (date of stamped label)</b>	<b>% ai</b>	<b>Methods of application</b>	<b>Use restrictions</b>	<b>Does the stamped label reflect the 2001 IRED mitigation?</b>	<b>Label changes effective in first quarter of 2008</b>
				<p>Stamped label still allows use on trees and woody evergreens in parks, residential, and recreational areas (prohibited in IRED).</p> <p>Still allows use on cotton.</p>		<p>feet for aerial), and droplet size (coarse or coarser) to reduce offsite drift.</p> <p>2008 label will prohibit use in residential areas.</p> <p>2008 label will remove cotton as a use site.</p> <p>See Table 2 for crop specific restrictions.</p>
Imidan 70-WSB (wetable powder in water soluble bags)	10163-184 (8/12/2005)	70%	Chemigation, Groundboom, Airblast, Aerial	<p>Use restrictions in environmental hazards statement: see 10163-168.</p> <p>Still allows use on cotton.</p> <p>Restrictions on wind speed (10 mph), release height above crop canopy (2 feet for ground, 10 feet for aerial), and droplet size (coarse or coarser) to reduce offsite drift.</p> <p>Other crop-specific restrictions listed in Table 2.</p>	Yes	<p>2008 label will remove cotton as a use site.</p> <p>See Table 2 for crop specific restrictions.</p>
Imidan 2.5 EC (emulsifiable concentrate)	10163-215 (2/20/2001)	27.5%  (2.5 lbs/gal)	Chemigation, Groundboom, Airblast, Aerial	<p>Use restrictions in environmental hazards statement: see 10163-168.</p>	No	<p>2008 label will prohibit use in residential areas.</p> <p>2008 label will remove cotton</p>

Formulation	Reg. no. (date of stamped label)	% ai	Methods of application	Use restrictions	Does the stamped label reflect the 2001 IRED mitigation?	Label changes effective in first quarter of 2008
				<p>Stamped label still allows use on trees and woody evergreens in parks, residential, and recreational areas (prohibited in IRED).</p> <p>Still allows use on cotton.</p>		<p>as a use site.</p> <p>2008 label will add restrictions on wind speed (10 mph), release height above crop canopy (2 feet for ground, 10 feet for aerial), and droplet size (coarse or coarser) to reduce offsite drift.</p> <p>See Table 2 for crop specific restrictions.</p>
Prolate/Lintox-HD Insecticidal Spray and Backrubber for Livestock (emulsifiable concentrate)	2724-262 (4/16/2002)	11.75%	Handwand, Backrubber	<p>The registrant for this product is Wellmark (Gowan is the registrant for all other products).</p> <p>For use on beef cattle, dairy cattle, and swine.</p> <p>Use restrictions in environmental hazards statement: Do not apply directly to water; do not contaminate water when disposing of equipment washwater or rinsate.</p>	Yes?	No 2008 label changes anticipated that will affect ecological risk.

**Table 2. Phosmet Use Information.**

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
Alfalfa (AZ, CA, NV only)	Imidan 70-W (10163-169)	0.7	N/A	1 per cutting	---	---
	Imidan 70-WSB (10163-184)					
	Imidan 50-WSB (10163-175)	0.75				
Alfalfa (NV only)	Imidan 2.5 EC (10163-215)	0.8	N/A	1 per cutting	---	---
Alfalfa (except AZ, CA, NV)	Imidan 70-W (10163-169)	0.9	N/A	1 per cutting	---	---
	Imidan 70-WSB (10163-184)					
	Imidan 50-WSB (10163-175)	1.0				
	Imidan 2.5 EC (10163-215)					
Almonds (growing season only)	Imidan 70-W (10163-169)	3.2	N/A	1	---	Note: the IRED limits the rate to 3 lbs ai/A. The 3.7 lb ai/A rate may be an error on current labels?
	Imidan 70-WSB (10163-184)					
	Imidan 50-WSB (10163-175)	3.0				
Almonds (CA only, growing season and dormant)	Imidan 70-W (10163-169)	3.7	---	2	---	



Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
	Imidan 70-WSB (10163-184)					
Apples	Imidan 70-W (10163-169)	3.7	---	---	21	In 2008, the maximum seasonal application rate will be reduced to 15.5 lbs ai/A on all product labels ( <i>January 2007 mitigation</i> ).
	Imidan 70-WSB (10163-184)					
	Imidan 50-WSB (10163-175)	4.0		Repeat as necessary		
Apricots	Imidan 70-W (10163-169)	3.0	---	---	9.1	In 2008, the 50-WSB label will be revised to limit the maximum annual application rate to 9.1 lbs ai/A.
	Imidan 50-WSB (10163-175)			Repeat as necessary	---	
Blueberries (Northeast only)	Imidan 50-WSB (10163-175)	1.0	---	2	---	2008 label will remove the geographic restriction, and change application rates as follows:  Highbush: 1 lb ai/A, 5 applications/year, 5 lbs ai/A per year.  Lowbush: 1 lb ai/A, 5 applications/year, 3.6 lbs ai/A per year.
Blueberries, high bush	Imidan 70-W (10163-169)	0.9	---	5	5.0	---
	Imidan 70-WSB (10163-184)					
Blueberries, low bush	Imidan 70-W (10163-169)	0.9	---	5	3.6	---
	Imidan 70-WSB					

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
	(10163-184)					
Cherries, sweet	Oregon SLN, only.					
Cherries, tart	Imidan 70-W (10163-169)	1.75	---	Repeat as necessary	5.25	Note: the IRED limits the rate to 1.5 lbs ai/A. The 1.75 lbs ai/A rate may be an error on current labels?  In 2008, the 50-WSB label will be revised to limit the maximum annual application rate to 5.25 lbs ai/A.
	Imidan 70-WSB (10163-184) Imidan 50-WSB (10163-175)				---	
Citrus (CA SLN)	SLN CA06000200  [Sec. 3: Imidan 70-W (10163-169)]	2.1	---	2	---	Residue data are needed to support this use, and it does not appear that such data have been submitted.
Clover	Idaho SLN, only.					
Cotton (except San Joaquin Valley, CA)	Imidan 50-WSB (10163-175)	1.0  Do not apply within one mile of coastal or estuarine waters, or 100 feet of aquatic habitats	3-7	---	10	In 2008, cotton will be deleted as a use site from all labels.
	Imidan 70-WSB (10163-184)	0.9  Do not apply within one mile of coastal or estuarine waters, or 100 feet of aquatic habitats	3-7		9.8	

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
	Imidan 2.5 EC (10163-215)	1.0  Do not apply within one mile of coastal or estuarine waters, or 100 feet of aquatic habitats	3-5		10	
Crabapples (CA only)	Imidan 70-W (10163-169)  Imidan 70-WSB (10163-184)	3.7	---	---	21	In 2008, the maximum seasonal application rate will be reduced to 15.5 lbs ai/A on all product labels ( <i>January 2007 mitigation</i> ).
Cranberries (except CA)	Imidan 70-W (10163-169)  Imidan 70-WSB (10163-184)	2.8	10	---	10.9	---
Grapes (east of the Rockies)	Imidan 70-W (10163-169)	1.5	---	Repeat as necessary	4.55	In 2008, the 50-WSB label will be revised to limit the annual application rate to 4.55 lbs ai/A.
	Imidan 70-WSB (10163-184)				---	
	Imidan 50-WSB (10163-175)				---	
Grapes (west of the Rockies)	Imidan 70-W (10163-169)	1.5	---	Repeat as necessary	4.55	
	Imidan 50-WSB (10163-175)	1			---	
Grapes (CA only)	Imidan 5 dust (10163-168)	1.5	---	Any time between egg hatch and pupation	---	This use will be deleted from the dust label in 2008.
Kiwi fruit	The IRED lists kiwi fruit as a use site (with a maximum application rate of 1 lb ai/A), and there is a tolerance for kiwi in the 40					

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
	CFR, but kiwi is not listed as a use site on section 3 or SLN label.					
Nectarines	Imidan 70-W (10163-169)	3.0	---	Repeat as necessary	9.1	In 2008, the 50-WSB label will be revised to limit the annual application rate to 9.1 lbs ai/A.
	Imidan 70-WSB (10163-184)				---	
	Imidan 50-WSB (10163-175)					
Peaches	Imidan 70-W (10163-169)	3.0	---	Repeat as necessary	11.9	In 2008, the 50-WSB label will be revised to limit the annual application rate to 11.9 lbs ai/A.
	Imidan 70-WSB (10163-184)				12	
	Imidan 50-WSB (10163-175)					
Pears	Imidan 70-W (10163-169)	5.0	---	Repeat as necessary	11.2	The maximum application rate for pears is listed incorrectly on current labels as 5 lbs ai/A. In 2008, it will be corrected to 4 lbs ai/A on all product labels.
	Imidan 70-WSB (10163-184)				---	
	Imidan 50-WSB (10163-175)					
Peas, fresh and dry (Pacific Northwest only)	Imidan 70-W (10163-169)	0.9	---	---	2.8	---
	Imidan 70-WSB (10163-184)	1.0			3.0	
	Imidan 50-WSB (10163-175)					
Pecans	Imidan 70-W (10163-169)	2.2	---	Repeat as necessary	7.0	In 2008, the 50-WSB label will be revised to limit the annual

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
	Imidan 70-WSB (10163-184)	2.25				application rate to 7 lbs ai/A.  Note: According to the IRED, the maximum rate per application is 3 lbs ai/A. However, the highest rate on any stamped label is 2.25 lbs ai/A.
	Imidan 50-WSB (10163-175)				---	
Pistachios (CA only)	Imidan 70-W (10163-169)	Growing season: 4.0	---	---	Total seasonal max.: 12	Note: the IRED limits the application rate to 3 lbs ai/A. The 4 lbs ai/A rate may be an error on current labels?
	Imidan 70-WSB (10163-184)	Dormant season: 3.0			Seasonal max. as foliar spray: 4.0	
Plums, prunes	Imidan 70-W (10163-169)	3.0	---	Repeat as necessary	9.1	In 2008, the 50-WSB label will be revised to limit the annual application rate to 9.1 lbs ai/A.
	Imidan 70-WSB (10163-184)				---	
	Imidan 50-WSB (10163-175)					
Potatoes	Imidan 70-W (10163-169)	0.9	10	---	4.7	---
	Imidan 70-WSB (10163-184)	1.0			5.0	
	Imidan 50-WSB (10163-175) Not recommended for use on potatoes in California					
	Imidan 2.5 EC (10163-215)					

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
Sweet potatoes	Imidan 70-W (10163-169)  Imidan 70-WSB (10163-184)	0.9	10	5	4.7	---
Sweet potatoes (post-harvest storage)	Imidan 5 dust (10163-168)	2-4 oz./50 lb bushel	N/A	1	2-4 oz./50 lb bushel	---
Walnuts, filberts, and other nuts (including Beech nut, Brazil nut, Butternut, Cashew, Chestnut, Chinquapin, Hickory nut, Macadamia nut, and all hybrids and cultivars of these)	Imidan 70-W (10163-169)  Imidan 70-WSB (10163-184)	5.95	---	5	12	---
Beef and non-lactating dairy cattle	Prolate/Lintox-HD Insecticidal Spray and Backrubber for Livestock (2724-262)	Spray: 1 lb ai/100 gal water  Backrubber: 1 lb ai/50 gal fuel oil	7-10	Repeat as necessary	---	Note: The IRED limits the application rate to 0.02 lbs ai/A (meaning unclear for application to cattle).
Swine	Prolate/Lintox-HD Insecticidal Spray and Backrubber for Livestock (2724-262)	Spray: Spray: 1 lb ai/100 gal water	14	2	---	Note: The IRED limits the application rate to 0.02 lbs ai/A (meaning unclear for application to swine).

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
Conifer seedlings: white, slash, and loblolly (as a top dip)	Imidan 70-W (10163-169)	4% top dip solution  1.75 lbs ai to make 5 gals of solution; 5 gals treats 10,000 seedlings	---	---	---	Note: The IRED limits the application rate to 0.35 lbs ai/A (meaning unclear for dip application method).
	Imidan 70-WSB (10163-184)					
	Imidan 50-WSB (10163-175)					
	Imidan 2.5 EC (10163-215)	4% top dip solution  1.7 lbs ai to make 5 gals of solution; 5 gals treats 10,000 seedlings				
Conifer tree seed orchards	Imidan 70-W (10163-169)	1.1	---	Current stamped labels are internally contradictory: they say both 3 and 7.	---	In 2008, labels will be revised to correct this contradiction (all other tree uses are limited to 3 applications per year).
	Imidan 70-WSB (10163-184)					
Conifer trees growing in Christmas tree nurseries and plantations	Imidan 70-W (10163-169)	1.1	---	3	---	In 2008, the 50-WSB and 2.5 EC labels will be revised to limit the maximum number of applications per year to 3.
	Imidan 70-WSB (10163-184)	Individual trees: 0.9 lbs ai/100 gal				
	Imidan 50-WSB (10163-175)	1.0		---		
	Imidan 2.5 EC (10163-215)					
Deciduous trees	Imidan 70-W (10163-169)	0.7 lbs ai/100 gal	---	3	---	In 2008, the 50-WSB and 2.5 EC labels will be revised to limit the maximum number of applications per year to 3.
	Imidan 70-WSB					

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
	(10163-184)					This use will be limited to nursery and commercial tree growing areas, only.
	Imidan 2.5 EC (10163-215)			Repeat as necessary		
	Imidan 50-WSB (10163-175)	0.75 lbs ai/100 gal		Repeat as necessary		
Deciduous shade trees: Ash, Beech, Birch, Elm, Hickory, Maple, Oak, Willow, Locust	Imidan 1-E Insecticide (10163-171)	Hydraulic sprayer: 0.75 lbs ai/100 gal Mist blower: 0.75 lbs ai/50 gal	---	Repeat as necessary	---	In 2008, the 1-E label will be revised to limit the maximum number of applications per year to 3.
Field margins: margins of cultivated fields and forage crop sites listed on this label	Imidan 70-W (10163-169)	1.9	---	---	---	---
	Imidan 70-WSB (10163-184)					
	Imidan 50-WSB (10163-175)	2.0				
	Imidan 2.5 EC (10163-215)					
Flowering trees and shrubs: Crape Myrtle, Jasmine, Dogwood, Lilac, Euonymus, Magnolia, Forsythia, Privet, Hawthorne (do not use on Washington Hawthorne)	Imidan 1-E Insecticide (10163-171)	Hydraulic sprayer: 0.75 lbs ai/100 gal Mist blower: 0.75 lbs ai/50 gal	---	Repeat as necessary	---	In 2008, the 1-E product label will be revised to limit the maximum number of applications per year to 3.
Ornamental plants and	Imidan 70-W	0.7 lbs ai/100 gal	---	3	---	---



Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008	
nonbearing fruit and nut trees and vines (growing in nurseries, and established ornamental landscape plantings)	(10163-169)  Imidan 70-WSB (10163-184)						
Pine trees (Pacific NW only)	Imidan 50-WSB (10163-175)	1.1  Individual trees: 0.9 lbs ai/100 gal	2 weeks	Repeat throughout flight period of moths	---	In 2008, the 50-WSB and 2.5 EC product labels will be revised to limit the maximum number of applications per year to 3.  This use will be limited to nursery and commercial tree growing areas, only.	
	Imidan 2.5 EC (10163-215)	1.0  Individual trees: 1.0 lbs ai/100 gal					
Roses	Imidan 1-E Insecticide (10163-171)	Hydraulic sprayer: 0.75 lbs ai/100 gal  Mist blower: 0.75 lbs ai/50 gal	---	Repeat as necessary	---	In 2008, the 1-E product label will be revised to limit the maximum number of applications per year to 3.	
Woody evergreens	Imidan 70-W (10163-169)	0.7 lbs ai/100 gal	---	3	---	In 2008, the 50-WSB and 2.5 EC product labels will be revised to limit the maximum number of applications per year to 3.  This use will be limited to nursery and commercial tree growing areas, only.	
	Imidan 70-WSB (10163-184)			Repeat as necessary			
	Imidan 2.5 EC (10163-215)	0.75 lbs ai/100 gal		---			
	Imidan 50-WSB (10163-175)						
Evergreens: Arborvitae, Azalea, Boxwood, Cotoneaster, Fir,	Imidan 1-E Insecticide (10163-171)	Hydraulic sprayer: 0.75 lbs ai/100 gal  Mist blower: 0.75	---	Repeat as necessary	---	In 2008, the 1-E product label will be revised to limit the maximum number of applications per year to 3.	

Use site	Product	Maximum application rate (lbs ai/A)	Minimum retreatment interval (days)	Maximum no. of applications	Maximum application rate/year (lbs ai/A)	Label changes effective in first quarter of 2008
Hemlock, Holly, Juniper, Mountain Laurel, Pine, Pyracantha, Rhododendron, Spruce, Yew		lbs ai/50 gal				
Fireants and fireant mounds	Fireban Fire Ant Insecticide (10163-174)	<p>Direct application with garden hose: One 1.125 oz packet (0.0087 lbs ai) per sq. ft. of mound</p> <p>Mound drench application with 2 gal. sprinkler can or bucket: One 1.125 oz packet (0.0087 lbs ai) per sq. ft. of mound (and 2 gal. of water). Drench mound and the surrounding 3-foot area.</p>	---	---	---	---